

**FILED****SEALED**

August 04, 2021

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASUNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISIONBY: BC  
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

VS.

EMARI LAFEL FREEMAN,

Defendant.

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§**Case No: SA-21-CR-00330-FB****INDICTMENT**

Ct 1: 18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

THE GRAND JURY CHARGES:

**COUNT ONE**  
**[18 U.S.C. § 922(g)(1)]**

On or about March 18, 2021, in the Western District of Texas, Defendant,

**EMARI LAFEL FREEMAN,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Glock 26, 9mm pistol, serial number BDNV518, and the firearm had traveled in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2]****I.****Firearm Violation and Forfeiture Statutes****[Title 18 U.S.C. § 922(g)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1),  
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violation set forth in Count One, the United States gives notice to Defendant EMARI LAFEL FREEMAN of its intent to seek the forfeiture of the properties

described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 924. Penalties**

**(d)(I)** Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties:

1. Glock 26, 9mm pistol, serial number BDNV518; and
2. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.

A TRUE BILL

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY:

  
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FOR WILLIAM F. CALVE  
Assistant United States Attorney